

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS,  
EASTERN DIVISION**

In re: Clearview AI, Inc.,  
Consumer Privacy Litigation

No. 1:21-CV-00135

Judge Sharon Johnson Coleman

Magistrate Maria Valdez

**DECLARATION OF EVAN MEYERS OF MCGUIRE LAW, P.C.**

I, Evan Meyers, hereby declare and state as follows:

1. I am a Partner at McGuire Law, P.C., a class action litigation law firm based in Chicago, IL.
2. I, and the attorneys at my firm, McGuire Law, have been litigating many BIPA cases over the past several years, and have been appointed class counsel in dozens of BIPA cases against a variety of companies, including employers, technology vendors, consumer companies, and others. One of those cases is *Rogers v. BNSF Railroad*, Case No. 19-CH-3083 (N.D. Ill).
3. *Rogers* had been litigated by our firm for over three years, and when it became clear that the case was not going to settle and would instead likely proceed to trial, we sought out recommendations for which law firm to partner with to try the case.
4. We understood that the trial would be the first BIPA case ever to be tried, and underwent a lengthy and thorough process to select the best trial counsel under the circumstances.
5. After consulting with multiple firms and conducting in-depth and diligent research we ultimately selected Loevy & Loevy as the firm best positioned to try a class action BIPA case, particularly in the Northern District of Illinois.
6. Our selection of Loevy & Loevy was the result of recommendations from numerous individuals (including a former federal judge) and a recognition of Loevy & Loevy's

impressive and lengthy record of success winning difficult cases, particularly civil rights cases.

7. Our belief was, and remains, that the Illinois Legislature in passing BIPA gave individuals an important right to privacy in their biometrics and that Loevy & Loevy's civil rights background made the firm particularly well suited to take on such a case.
8. McGuire Law and Loevy & Loevy had no prior relationship, either professionally or personally, prior to selecting Loevy & Loevy to try the case.
9. Loevy & Loevy did a masterful job of getting up to speed quickly, understanding the facts, reviewing thousands of documents, the law specific to that case, and working hand-in-glove with us to develop a successful trial strategy.
10. Ultimately, Loevy & Loevy performed fantastic work, deftly navigated many issues of first impression, and seamlessly delivered an incredible and groundbreaking result in the *Rogers* case.
11. Put simply, in the *Rogers* case, Loevy & Loevy were instrumental in the achievement of a jury verdict in favor of Plaintiff Rogers and the Certified Class.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 21, 2022 in Northbrook, Illinois.

/s/ Evan M. Meyers  
Evan M. Meyers, Esq.